

EXHIBIT B

Charles Sweeney

11/21/2006

UNITED STATES DISTRICT
DISTRICT OF MASSACHUSETTS

Civ. Action No. 04-10294 DPW

DEBORAH CHIN, individually and on
behalf of all others similarly
situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. AND STEPHEN NILL,

Defendants.

DEPOSITION OF CHARLES SWEENEY

November 21, 2006

Wyndham Hotel

8100 International Drive

Orlando, Florida 32819

9:27 a.m. - 12:29 p.m.

Reported by:

Lori Junker, RPR

Notary Public, State of Florida

1 strike that.

2 At the time that you authorized the
3 commencement of this litigation asserting fraud
4 claims against Sonus Networks, Hassan Ahmed and
5 Stephen Nill, what was your basis for the assertion
6 of fraud?

7 A You know, the recommendation of counsel.

8 Q Other than what counsel's recommendation
9 may have been, were you aware of any facts that
10 supported the assertion of a fraud claim against the
11 defendants?

12 A Well, there were restatements involved in
13 financial statements. There were disclosures that
14 had been made as I understand it that were not
15 accurate.

16 Q And is there anything that you're aware of
17 with respect to those two items that you just
18 identified that provide a factual basis for asserting
19 fraud?

20 A I don't think I'm in a position to answer
21 the question. I am not sure what a factual basis is.

22 Q Well, in your experience as a CPA does the
23 fact that a company may restate its financials mean
24 that the restatement is as a result of fraud at the
25 company?

1 MR. CERA: Object to the form.

2 THE WITNESS: Not necessarily.

3 BY MR. MATULE:

4 Q And so I'll ask you to answer my question
5 one more time.

6 MR. CERA: I think he's answered it.

7 BY MR. MATULE:

8 Q Sir, are you sitting here today or at the
9 time that you authorized the filing of this lawsuit
10 and other than you've already testified, are you
11 aware of any facts that would support the claim of
12 fraud in this case?

13 MR. CERA: Asked and answered.

14 THE WITNESS: I guess I would ask the
15 question: What facts are required to establish
16 fraud that might assist me to answer that
17 question?

18 BY MR. MATULE:

19 Q Well, if you like, you can take a break
20 and talk to your counsel about the legal requirements
21 for a fraud claim. Would you like to do that?

22 MR. CERA: Well, I think he's already
23 testified that he's relied, at least in part, on
24 the recommendations and work of counsel. I
25 think he's answered your question. Do you have